

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

United States

v.

Antonio Chatman

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Case No. 15-CR-10146-FDS

DEFENDANT ANTONIO CHATMAN'S MOTION TO FILE EX PARTE & UNDER SEAL
CERTAIN FILINGS RELATED TO DISCOVERY

Defendant Antonio Chatman hereby moves that this Court grant leave to file ex parte and seal certain filings to be filed upon the allowance with this motion. As grounds therefor, Defendant avers that in response to concerns related to witness safety, the Government has sought, *inter alia*, to place conditions on the manner and means by which discovery in this case is provided to the defendants. See Government's Response to Court's Inquiry filed August 3, 2015, document # 59 with attachments.

WHEREFORE, Mr. Chatman moves that this Court grant leave for him to file ex parte and under seal certain filings related to discovery pursuant to the Government's 2nd Protective Order.

ANTONIO CHATMAN
By his attorney,

/s/ John Salsberg
John Salsberg
B.B.O. No. 439300
LAW OFFICE OF JOHN SALSBERG
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Dated: August 28, 2015

CERTIFICATE OF SERVICE

I, John Salsberg, hereby certify that on this 28th day of August 2015 the foregoing was filed via the ECF system and will be sent electronically to the registered participants as identified on the Notice of Electronic Filing ("NEF") and paper copies will be sent to those indicated as non-registered participants.

/s/ John Salsberg
John Salsberg